

AO 91 (Rev. 08/09) Criminal Complaint

UNITED STATES DISTRICT COURT

for the

Northern District of Oklahoma

FILED

SEP 30 2020

United States of America
v.

Case No.

20-mj-343-PJC

Mark C. McCartt, Clerk
U.S. DISTRICT COURT

Rebecca Raye Jackson

Defendant(s)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of September 26, 2020 in the county of Tulsa in the
Northern District of Oklahoma, the defendant(s) violated:

Code Section
18 USC 1151, 1153, and 2111

Offense Description
Robbery in Indian Country

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

Sworn to before me and signed in my presence.

Date:

9/30/20

City and state: Tulsa, OK



Complainant's signature

Chad Moyer, FBI TFO

Printed name and title



Judge's signature

Paul J. Cleary, United States Magistrate Judge

Printed name and title

AFFIDAVIT

I, FBI Task Force Officer Chad Moyer, being duly sworn under oath, do hereby depose and state:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Task Force Officer with the Federal Bureau of Investigation. I have been employed as a Tulsa Police Officer in Tulsa, Oklahoma since 1998. As a result of my employment with the Tulsa Police Department, my duties include, but are not limited to, the investigation and enforcement of robberies. I have received training in Indian Country and violent crimes, and have investigated violent crimes in Indian country. I am "an investigative or law enforcement officer of the United States" within the meaning defined in 18 U.S.C. § 2510 (7), in that I am a Robbery Detective for the Tulsa Police Department and authorized by law to conduct investigations of violent crimes.

2. As part of my duties as a Robbery Detective, I investigate criminal violations relating to crime in Indian Country, to include robbery in violation of 18 U.S.C. §§ 1151, 1153, and 2111 (Robbery in Indian Country). Based on my training and experience, I know that it is a violation of Title 18 U.S.C. §§ 1151, 1153, 2111 for any person, within the special maritime and territorial jurisdiction of the United States, by force and violence, or intimidation, to take or attempt to take from the person or presence of another anything of value.

3. The facts and statements in this affidavit are based in part on information provided by other law enforcement officers and on my personal observations and training and experience as a Robbery Detective for the Tulsa Police Department. Because this

affidavit is submitted for the limited purpose of establishing probable cause in support of the attached complaint, this affidavit does not set forth each and every fact I have learned during this investigation.

FACTS SUPPORTING PROBABLE CAUSE

4. The suspect is identified as Rebecca Raye Jackson. She has a date of birth of xx/xx/1987. At all times relevant to the Complaint, Rebecca Jackson, according to the Cherokee Nation of Oklahoma Citizenship Board, was and is a member of Cherokee Nation.

5. That the incident occurred in Tulsa County, State of Oklahoma, within the bounds of the Creek Nation Indian Reservation, which is considered Indian Country as defined in Title 18 U.S.C § 1151.


6. That on September 26, 2020, Rebecca Jackson, by force and violence, or intimidation, did take or attempt to take from the person or presence of another something of value. Specifically, at approximately 1320 hours, Ms. Jackson and an accomplice lured the victim, J.P., into their hotel room with the promise of sex. The hotel room was located at the Super 8 Motel located in Northern District of Oklahoma at 3211 S. 79th East Avenue, Tulsa, OK. When the victim entered into the hotel room, Ms. Jackson's accomplice locked the door so that the victim could not escape. Ms. Jackson then produced a shotgun and pointed the shotgun at the victim. Ms. Jackson demanded that the victim give her everything in his pockets. At gunpoint, the victim gave Ms. Jackson his keys, wallet, and cellular phone. Ms. Jackson took the items from the victim and left the room with her accomplice.

7. On September 27, 2020, Tulsa Police Detectives located both Ms. Jackson and her accomplice in different hotel rooms near the location of the robbery. The shotgun used by Ms. Jackson was found in the accomplice's room during a consent search. The victim, J.P., identified Ms. Jackson and her accomplice as the two individuals that robbed him the night before on September 26, 2020.

CONCLUSION

8. That, to the best of my knowledge and belief, all statements made in this affidavit are true and correct. Based on the foregoing facts, I believe probable cause exists for the issuance of a criminal complaint and arrest warrant for Rebecca Raye Jackson for violating Title 18 U.S.C. §§ 1151, 1153, and 2111.

Dated this 29 day of September, 2020.



Chad Moyer, Task Force Officer
Federal Bureau of Investigations

Sworn to before me this 30th day of September, 2020.



United States Magistrate Judge